

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Parus Holdings, Inc. Plaintiff,  
(Appellant)

7 cv 10507 (BSJ)

- against -

WorldCom, Inc. Defendant.  
(Appellee)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Robert A. Scher a member in good standing of  
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Joanne Lee  
Firm Name: FOLEY & LARDNER LLP  
Address: 321 NORTH CLARK STREET, SUITE 2800  
City/State/Zip: CHICAGO, ILLINIOS 60610  
Phone Number: (312) 832-4500  
Fax Number: (312) 832-4700

Joanne Lee is a member in good standing of the Bar of the State of  
Illinois

There are no pending disciplinary proceeding against Joanne Lee  
in any State or Federal court.

Dated: Nov. 30, 2007  
City, State: New York, NY

Respectfully submitted,

Robert Scher

Sponsor's  
SDNY Bar: RS 2910  
Firm Name: Foley & Lardner LLP  
Address: 90 Park Avenue  
City/State/Zip: New York, NY 10016  
Phone Number: 212 682 7474  
Fax Number: 212 687 2329

FILED  
2007 DEC -3 PM 3:06  
S.D. OF N.Y.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Parus Holdings, Inc. (Appellant) Plaintiff,

7 cv 10507 (BSJ)

- against -

WorldCom, Inc. (Appellee) Defendant.

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Robert A. Scher attorney for Parus Holdings, Inc.

and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Joanne Lee  
Firm Name: FOLEY & LARDNER LLP  
Address: 321 NORTH CLARK STREET, SUITE 2800  
City/State/Zip: CHICAGO, ILLINOIS 60610  
Telephone/Fax: (312) 832-4500  
Email Address: (312) 832-4700

is admitted to practice pro hac vice as counsel for Parus Holdings, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State: New York, NY

\_\_\_\_\_  
United States District/Magistrate Judge

UNITED STATES DISTRICT

SOUTHERN DISTRICT OF NEW YORK

Parus Holdings, Inc.

Appellant,

- against -

WorldCom, Inc.

Appellee.

07 cv 10507 (BSJ)

AFFIDAVIT OF  
ROBERT A. SCHER  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE

State of New York )

) ss: Joanne Lee

County of New York )

Robert A. Scher, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Foley & Lardner LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Joanne Lee as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 23, 1987. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Joanne Lee since 2004.
4. Joanne Lee is an Associate at Foley & Lardner LLP in Chicago, Illinois. Ms. Lee is a member in good standing of the bar in Illinois (Certificate of Good Standing attached hereto).
5. I have found Ms. Lee to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Joanne Lee, pro hac vice.

WHEREFORE it is respectfully requested that the motion to admit Joanne Lee, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: *November 30, 2007*

City, State: New York, NY

Notarized:

SAMANTHA S. EDITE  
NOTARY PUBLIC, State of New York  
No. 01ED6068678  
Qualified in Kings County  
Commission Expires Jan. 14, 20 *10*

*Samantha S. Edite*

Respectfully submitted,

*Robert A. Scher*

Name of Movant: Robert A. Scher

SDNY Bar Code: 2124790

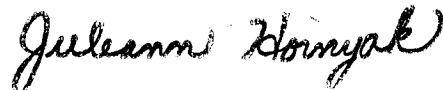
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Joanne Lee

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 4, 2004 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Thursday, November 01, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PARUS HOLDINGS, Inc.

Appellant,

against

WORLD.COM, INC.

Appellee.

Index No. 7 cv 10507 (BSJ)

## AFFIDAVIT OF SERVICE

[illegible]

AVA BESSEL, being duly sworn, deposes and says:


Deponent is not a party to the action, is over 18 years of age, and resides at 400 East 50<sup>th</sup> Street, New York, New York 10022.

That on the 3<sup>rd</sup> day of December, 2007, appellant Parus Holdings, Inc. served a copy of the **Motion for the Admission to Practice, *Pro Hac Vice*, of Joanne Lee** by Regular Mail on:

Brian K. O'Bleness, Esq. (BO 9790)  
Allison M. Murdock, Esq. (*pro hac vice being filed*)  
Mark M. Iba, Esq. (*pro hac vice being filed*)  
1201 Walnut Street, Suite 2900  
Kansas City, MO 64106  
Telephone: (816) 842-8600  
Facsimile: (816) 691-3495

  
AVA BESSEL

Sworn to before me this  
3<sup>rd</sup> day of December, 2007

  
Notary Public

**MARY L. MORAN**  
**Notary Public, State of New York**  
**No. 01MO6139146**  
**Qualified in Queens County**  
**Certificate Filed in New York County**  
**Commission Expires 01/03/2011**